

ADMINISTRATIVE PANEL DECISION

International Baccalaureate Organization v. FlokiNET Ltd WhoisProtection
FlokiNET Ltd WhoisProtection, FlokiNET Ltd, lamao cringe, lamao cringe
Case No. D2025-5046

1. The Parties

The Complainant is International Baccalaureate Organization, Switzerland, represented by Pellervo Digital B.V., Netherlands (Kingdom of the).

The Respondents are FlokiNET Ltd WhoisProtection FlokiNET Ltd WhoisProtection, FlokiNET Ltd, Seychelles; and lamao cringe, lamao cringe, Germany.

2. The Domain Names and Registrars

The disputed domain name <ibdocs.net> is registered with Squarespace Domains LLC.

The disputed domain name <pirateib.xyz> is registered with Tucows Domains Inc.

(each a “Registrar” and collectively the “Registrars”).

3. Procedural History

The Complaint was filed with the WIPO Arbitration and Mediation Center (the “Center”) on December 4, 2025. On December 4, 2025, the Center transmitted by email to the Registrars a request for registrar verification in connection with the disputed domain names. On December 4, 2025, the Registrars transmitted by email to the Center its verification response disclosing registrant and contact information for the disputed domain names which differed from the named Respondent (REDACTED FOR PRIVACY) and contact information in the Complaint. The Center sent an email communication to the Complainant on December 16, 2025 with the registrant and contact information of nominally multiple underlying registrants revealed by the Registrars, requesting the Complainant to either file separate complaints for the disputed domain names associated with different underlying registrants or alternatively, demonstrate that the underlying registrants are in fact the same entity and/or that all domain names are under common control. The Complainant filed an amended Complaint on December 22, 2025.

The Center verified that the Complaint together with the amended Complaint satisfied the formal requirements of the Uniform Domain Name Dispute Resolution Policy (the “Policy” or “UDRP”), the Rules for Uniform Domain Name Dispute Resolution Policy (the “Rules”), and the WIPO Supplemental Rules for Uniform Domain Name Dispute Resolution Policy (the “Supplemental Rules”).

In accordance with the Rules, paragraphs 2 and 4, the Center formally notified the Respondents of the Complaint, and the proceedings commenced on December 23, 2025. In accordance with the Rules, paragraph 5, the due date for Response was January 12, 2026. The Respondent did not submit any response. Accordingly, the Center notified the Respondents’ default on January 13, 2026.

The Center appointed Evan D. Brown as the sole panelist in this matter on January 20, 2026. The Panel finds that it was properly constituted. The Panel has submitted the Statement of Acceptance and Declaration of Impartiality and Independence, as required by the Center to ensure compliance with the Rules, paragraph 7.

4. Factual Background

The Complainant is in the business of providing educational content, assessment materials, and related digital services. It is the exclusive holder of trademark rights in the marks IB and INTERNATIONAL BACCALAUREATE. It enjoys the benefits of registration of various marks comprising these elements in numerous jurisdictions worldwide. By way of example, the Complainant owns United States Trademark Registration No. 5473787 (registered on May 22, 2018), which consists of the stylized letters “IB” forming a circular design together with other wording comprising the mark.

According to the Whois records, the disputed domain names <pirateib.xyz> and <ibdocs.net> were registered on September 2, 2024, and December 13, 2024, respectively. The Respondents have used the disputed domain names to operate websites that distribute the Complainant’s copyright-protected content without authorization.

5. Parties’ Contentions

A. Complainant

The Complainant contends that the disputed domain names are identical or confusingly similar to the Complainant’s mark; that the Respondents have no rights or legitimate interests in respect of the disputed domain names; and that the disputed domain names were registered and are being used in bad faith.

B. Respondent

The Respondents did not reply to the Complainant’s contentions.

6. Discussion and Findings

To succeed, the Complainant must demonstrate that all of the elements listed in paragraph 4(a) of the Policy have been satisfied: (i) the disputed domain names are identical or confusingly similar to a trademark or service mark in which the Complainant has rights; (ii) the Respondents have no rights or legitimate interests in respect of the disputed domain names; and (iii) the disputed domain names were registered and are being used in bad faith. The Panel finds that all three of these elements have been met in this case.

A. Preliminary Issue – Consolidation of Multiple Respondents

There are two named Respondents corresponding to the two disputed domain names. The Complainant requests that the dispute concerning <ibdocs.net> and <pirateib.xyz> be consolidated into a single proceeding.

Paragraph 10(e) of the Rules provides that a panel shall decide a request by a party to consolidate multiple domain name disputes in accordance with the Policy and the Rules. Paragraph 10(c) of the Rules further directs the Panel to ensure that the administrative proceeding takes place with due expedition.

Section 4.11.2 of the WIPO Overview of WIPO Panel Views on Selected UDRP Questions, Third Edition (“[WIPO Overview 3.0](#)”) reflects the consensus view that consolidation of multiple respondents may be appropriate where the disputed domain names or corresponding websites are subject to common control and where consolidation would be fair and equitable to all parties.

The Panel finds that the record supports a finding of common control. The Complainant has provided credible evidence that the websites to which the disputed domain names resolve contain reciprocal hyperlinks to one another, presenting themselves as alternate access points or mirrors within a unified system. Both websites distribute the same copyright-infringing content belonging to the Complainant, including overlapping document sets and file versions, and are devoted to the unauthorized reproduction and dissemination of the Complainant’s protected works. The websites also share a substantially similar structure, layout, and navigational logic, suggesting a shared backend or content management system. In addition, observable updates and content changes to the two websites occur in a coordinated temporal pattern.

The Respondents have not come forward with any arguments or evidence to suggest that consolidation would be unfair or inequitable. In these circumstances, the Panel finds that consolidation is appropriate and promotes procedural efficiency. Accordingly, the Complainant’s request for consolidation is granted.

B. Identical or Confusingly Similar

The first element under the Policy functions primarily as a standing requirement. The standing (or threshold) test for confusing similarity involves a reasoned but relatively straightforward comparison between the complainant’s trademark and the disputed domain name. [WIPO Overview 3.0](#), section 1.7.

A registered trademark provides a clear indication that the rights in the mark shown on the trademark certificate belong to its respective owner. The Complainant has demonstrated its rights in the IB mark through evidence of its trademark registrations, including registrations in the United States and other jurisdictions. See [WIPO Overview 3.0](#), section 1.2.1.

The disputed domain names each incorporate the IB mark in its entirety. The addition of the terms “pirate” and “docs” does not prevent a finding of confusing similarity. Where a relevant trademark is recognizable within a disputed domain name, the addition of other terms, whether descriptive, pejorative, or otherwise, does not avoid confusing similarity under the first element of the Policy. See [WIPO Overview 3.0](#), section 1.8. In each case, the IB mark remains clearly recognizable.

It is standard practice to disregard the applicable Top-Level Domain (“.xyz” and “.net”) for purposes of assessing confusing similarity, as it is viewed as a technical registration requirement. See [WIPO Overview 3.0](#), section 1.11.1.

The Panel further notes that the content of the website associated with a disputed domain name is usually disregarded when assessing confusing similarity under the first element. See [WIPO Overview 3.0](#), section 1.15. In some instances, however, panels have taken note of such content to confirm confusing similarity where it appears prima facie that the respondent seeks to target the complainant's trademark through the disputed domain name. Guided by these principles, the Panel takes note of the content of the Respondents' websites, which appear to be used to distribute materials that the Complainant provides under its IB mark, to confirm the confusing similarity between the disputed domain names and the Complainant's trademark.

Accordingly, the Panel finds that the Complainant has established the first element under paragraph 4(a) of the Policy.

C. Rights or Legitimate Interests

The Panel assesses this element by first considering whether the Complainant has made a prima facie showing that the Respondents lack rights or legitimate interests in the disputed domain names. If such a showing is made, the burden of production shifts to the Respondents to come forward with evidence demonstrating rights or legitimate interests, with the overall burden of proof remaining on the Complainant. [WIPO Overview 3.0](#), section 2.1.

On this point, the Complainant asserts that the Respondents are not licensees of the Complainant, and that the Complainant has not granted any authorization, permission, or consent, express or implied, for the use of its IB trademark in any domain name. The Complainant further asserts that the Respondents are not commonly known by the disputed domain names and that there is no evidence the Respondents have acquired any trademark or service mark rights in the IB mark. The Complainant also contends that the Respondents are not making any legitimate noncommercial or fair use of the disputed domain names, nor are the disputed domain names being used in connection with a bona fide offering of goods or services.

The Panel finds that these assertions are sufficient to establish a prima facie case that the Respondents lack rights or legitimate interests in the disputed domain names. The Respondents have not submitted a Response and therefore have not come forward with any evidence to rebut this prima facie showing. Nothing in the record otherwise tips the balance in the Respondents' favor.

Moreover, the use of a domain name to engage in illegal activity, such as the unauthorized distribution of copyright-protected materials, can never confer rights or legitimate interests on a respondent. See [WIPO Overview 3.0](#), section 2.13.1.

Accordingly, the Panel finds that the Complainant has established the second element under paragraph 4(a) of the Policy.

D. Registered and Used in Bad Faith

Under paragraph 4(a)(iii) of the Policy, the Complainant must establish that the disputed domain names were registered and are being used in bad faith.

The Panel finds that the disputed domain names were registered and are being used in bad faith. The Panel finds it more likely than not that the Respondents registered the disputed domain names with full knowledge of the Complainant and its IB trademarks. Given the nature of the disputed domain names and the content of the associated websites, the Panel finds it implausible that the Respondents were unaware of the Complainant's rights at the time of registration.

The Respondents' use of the disputed domain names to distribute the Complainant's copyright-protected materials without authorization is a clear indication of bad faith use. In the Panel's view, this conduct demonstrates bad faith within the meaning of paragraph 4(b)(iv) of the Policy, as the Respondents have intentionally attempted to attract, for commercial gain, Internet users to their websites or other online locations by creating a likelihood of confusion with the Complainant's IB mark as to the source, sponsorship, affiliation, or endorsement of the Respondents' websites or of the content made available there.

In these circumstances, the Panel finds that the disputed domain names were registered and are being used in bad faith within the meaning of paragraph 4(a)(iii) of the Policy.

7. Decision

For the foregoing reasons, in accordance with paragraphs 4(i) of the Policy and 15 of the Rules, the Panel orders that the disputed domain names <ibdocs.net> and <pirateib.xyz> be transferred to the Complainant.

/Evan D. Brown/

Evan D. Brown

Sole Panelist

Date: February 3, 2026